



Office of Audits
Office of Inspector General
U.S. General Services Administration

PBS Is Not Effectively Tracking and Monitoring Building Studies

Report Number A240084/P/6/R26002
March 6, 2026

Executive Summary

PBS Is Not Effectively Tracking and Monitoring Building Studies

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Why We Performed This Audit

We performed this audit to assess the GSA Public Buildings Service's (PBS's) use of building studies for GSA-owned federal buildings. This audit was included in the GSA Office of Inspector General's *Fiscal Year 2024 Audit Plan*. Our objectives were to determine if PBS building studies: (1) result in effective federal building management at the best value for taxpayers and (2) are conducted in accordance with applicable laws and regulations.

What We Found

During our 5-year audit period ended September 30, 2024, PBS obligated more than \$133 million for building studies commissioned by its Office of Portfolio Management alone. Building studies fill a critical need for PBS's management and oversight of its large and diverse real property portfolio. PBS hires consultants to conduct building studies to investigate and document building conditions, develop and evaluate improvement options, and provide program guidance. PBS uses these studies to inform management decisions about acquiring, renovating, operating, and maintaining buildings. Further, building studies are federal records and must be preserved in accordance with the Federal Records Act of 1950 and associated GSA records-retention policies.¹

However, PBS is not effectively managing its building studies. We found that PBS is neither comprehensively tracking nor monitoring its building studies. We also found that PBS does not have complete, accurate, and reliable data on the studies performed, or on the actions taken as a result of the studies. Because of these deficiencies, we were unable to determine if building studies result in effective building management at the best value for taxpayers or if the studies were conducted in accordance with applicable laws and regulations.

PBS is currently undergoing a major reorganization, under which it will move to a centralized management structure with fewer personnel. Under this new structure, PBS will need complete, accurate, and reliable information about all aspects of its operations, including its

¹ The Federal Records Act of 1950 is codified in 44 U.S.C. Chapter 21, *National Archives and Records Administration*; 44 U.S.C. Chapter 29, *Records Management by the Archivist of the United States and by the Administrator of General Services*; 44 U.S.C. Chapter 31, *Records Management by Federal Agencies*; and 44 U.S.C. Chapter 33, *Disposal of Records*.

GSA records-retention policies include GSA Order CIO 1820.2A, *GSA Records Management Program* (updated June 20, 2024); and GSA's *Recordkeeping for PBS Facilities Management* (May 15, 2020).

building studies, to effectively and efficiently allocate resources to manage its nationwide portfolio of buildings.

What We Recommend

We recommend that the PBS Commissioner:

1. Develop and implement a method to track and monitor building studies and ensure that PBS can retrieve all studies efficiently.
2. Develop and implement policies and procedures to ensure that:
 - a. PBS building study data is complete, accurate, and reliable;
 - b. PBS is not wasting tax dollars on unnecessary or duplicative building studies; and
 - c. Building studies are preserved in accordance with the Federal Records Act of 1950 and GSA records-retention policies.

The PBS Acting Commissioner stated that GSA agrees with the report recommendations. His written comments are included in their entirety in ***Appendix C***.

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Introduction

We performed an audit of the GSA Public Buildings Service's (PBS's) use of building studies for GSA-owned federal buildings.

Purpose

This audit was included in the GSA Office of Inspector General's *Fiscal Year 2024 Audit Plan* based on our determination that PBS faces risks from: (1) contracting for redundant or unnecessary building studies and (2) resolving building deficiencies identified through these studies.

Objectives

Our objectives were to determine if PBS building studies: (1) result in effective federal building management at the best value for taxpayers and (2) are conducted in accordance with applicable laws and regulations.

See **Appendix A** – Objectives, Scope, and Methodology for additional details.

Background

PBS's mission is to provide federal workspace at the best value to U.S. taxpayers. To fulfill this mission, PBS manages a portfolio of more than 8,500 GSA-controlled (owned and leased) buildings containing 359 million square feet of space. GSA manages this portfolio with funds collected and deposited into the Federal Buildings Fund (FBF).²

Congress established the FBF in 1972 as a revolving fund to finance GSA's real property needs. GSA funds the FBF through the rent it collects from tenant agencies. GSA then seeks congressional authority to use FBF funds for necessary expenses to operate, maintain, protect, and repair GSA-controlled space. In Fiscal Year (FY) 2025, the FBF was projected to have approximately \$20 billion in available resources. Congress authorized GSA to spend \$9.3 billion of those FBF funds in FY 2025.³

Included in GSA's \$9.3 billion FBF-authorized spending for FY 2025 is nearly \$3.3 billion in FBF funds for Building Operations, commonly referred to as budget activity 61 (BA 61). PBS uses BA 61 to fund the day-to-day goods and services needed to operate and maintain GSA-controlled space. PBS also uses BA 61 to fund building studies to assess: (1) site acquisition, (2) building design and construction options, and (3) fire and life safety building improvement

² 40 U.S.C. 592, *Federal Buildings Fund*.

³ According to GSA's budget request for FY 2026, the FBF's available resources of approximately \$20 billion were based on a beginning FBF balance of \$9.7 billion and projected revenue of \$10.5 billion.

options. Accordingly, these studies fill a critical need for PBS's management and oversight of its large and diverse real property portfolio.

Responsible PBS Business Lines

Requests for building studies are primarily made by two PBS business lines: (1) the Office of Portfolio Management and Customer Engagement (Portfolio Management) and (2) the Office of Facilities Management (Facilities Management).

Portfolio Management. This PBS business line oversees PBS's real estate portfolio, which includes: (1) managing GSA's strategic direction for assets; and (2) developing and reviewing PBS policies related to workspace pricing, occupancy, and customer rent. In addition, Portfolio Management is responsible for overseeing building studies related to both PBS's Capital Investment and Leasing Program and other day-to-day building operations. Examples of these commissioned studies are provided below.

Capital Investment and Leasing Program Studies. The Capital Investment and Leasing Program evaluates and proposes funds for capital projects based upon the following types of studies:

- **Feasibility Studies** – Define project goals, scopes, and customer needs; and assess alternate fulfillment methods.
- **Program Development Studies** – Develop a project in detail and propose a construction budget and implementation strategy.
- **Enhanced Feasibility Studies** – Combine the efforts of feasibility and program development studies into one study document. These studies encompass the estimated total project costs, which include site design and construction.
- **Building Evaluation Report** – Typically focus on PBS's repair and alterations needs and identify deferred maintenance.
- **Arc Flash Studies** – Determine hazards and risks related to electrical systems. Electrical safety experts perform the studies, which result in recommended electrical improvements and requirements for proper personal protective equipment.

- **Structural Studies** – These include progressive collapse and blast vulnerability assessment studies:
 - *Progressive Collapse Studies* – Measure a building’s resistance to a catastrophic structural failure caused by or following a serious event, such as a car bomb explosion.
 - *Blast Vulnerability Assessment Studies* – Determine potential building structural and façade damage from a blast by estimating the likelihood of loss and the extent of injury to people and other assets. These studies also explore options to improve a building’s site, structure, and façade to minimum security standards.

Day-to-Day Building Operations Studies. These are other discretionary studies PBS regional offices can request, such as building engineering inspections for minor repairs and seismic studies to evaluate a building’s earthquake resistance.

Facilities Management. This PBS business line’s mission is to provide safe, reliable, productive, and sustainable federal workplaces at the best value to taxpayers. Facilities Management oversees PBS’s Occupational Safety and Health Program and commissions studies from technical experts to provide solutions to fire and life safety problems identified at GSA-owned buildings. Examples of these studies include:

- **Environmental Studies** – Assess air and water quality for environmental contaminants.
- **Stormwater Studies** – Determine the effectiveness of various stormwater management techniques, the quality of stormwater runoff from buildings, and the potential for reusing harvested stormwater for irrigation.
- **Arc Flash Studies** – Determine hazards and risks related to electrical systems. Electrical safety experts perform the studies, which result in recommended electrical improvements and requirements for proper protective equipment.

Records Management

The Federal Records Act of 1950 requires federal agencies to preserve federal records, which include building studies.⁴ The law was passed to improve performance and promote openness and accountability by better documenting agency actions and decisions. To comply with this law, GSA established a records management program. GSA Order CIO 1820.2A, *Records Management Program*, updated June 20, 2024, requires GSA employees to preserve federal records for secure and efficient retrieval.

⁴ 44 U.S.C. 21, 29, 31, and 33.

Prior Office of Inspector General Audit Report Related to Issues with Building Studies

In March 2019, we issued an audit report that found that PBS did not protect tenants, contractors, and visitors from environmental hazards at the Goodfellow Federal Complex in St. Louis, Missouri.⁵ From January 1, 2002, through December 31, 2016, PBS contracted for at least 33 environmental studies at the Goodfellow Federal Complex, at a cost of more than \$1.9 million.

Most of the studies reviewed during that audit indicated various hazards were present at the complex and, in many cases, the results of the studies were duplicative of previous studies. Although the studies identified the presence of many environmental hazards at the complex, including lead, asbestos, and other known cancer-causing agents, PBS did not comprehensively address the deficiencies and inform the complex's occupants of the existing conditions.

⁵ *Audit of Environmental Issues at the Goodfellow Federal Complex in St. Louis, Missouri* (Report Number A170027/P/6/R19002, March 15, 2019).

Results

Finding – PBS is not effectively tracking and monitoring its use of building studies.

During our 5-year audit period ended September 30, 2024, PBS obligated more than \$133 million for building studies commissioned by Portfolio Management alone. Building studies fill a critical need for PBS’s management and oversight of its large and diverse real property portfolio. PBS hires consultants to conduct building studies to investigate and document building conditions, develop and evaluate improvement options, and provide program guidance. PBS uses these studies to inform management decisions about acquiring, renovating, operating, and maintaining buildings. Further, building studies are federal records and must be preserved in accordance with the Federal Records Act of 1950 and associated GSA records-retention policies.

However, PBS is not effectively managing its building studies. We found that PBS is neither comprehensively tracking nor monitoring its building studies. We also found that PBS does not have complete, accurate, and reliable data on the studies performed, or on the actions taken as a result of the studies. Because of these deficiencies, we were unable to determine if building studies result in effective building management at the best value for taxpayers or if the studies were conducted in accordance with applicable laws and regulations.

Building Studies Are Needed for PBS to Effectively Manage Its Real Property Portfolio

As described in the *Background* section, building studies fill a critical need for PBS’s management and oversight of its large and diverse real property portfolio. PBS commissions building studies to determine how to meet customer needs, ascertain deferred maintenance, and assess working conditions. Some examples of these studies are described below.

- **Feasibility Studies** – Define project goals, scopes, and customer needs, and assess alternate fulfillment methods. PBS project managers use feasibility studies to weigh the pros and cons of undertaking a project before investing a lot of time and money.
- **Building Evaluation Report** – Typically focus on PBS’s repair and alterations needs and identify deferred maintenance. They include a visual inspection of a building’s systems and components PBS uses to identify, estimate, and prioritize reinvestment needs for GSA’s portfolio planning.
- **Environmental Studies** – PBS uses these studies to determine improvements needed in response to unhealthful working conditions, including assessments of air and water quality. For example, PBS may contract for studies of asbestos, lead, mold, or other environmental contaminations identified during safety inspections.

As noted in the examples, building studies provide information essential for PBS to effectively manage and maintain its real property portfolio.

PBS Is Not Effectively Tracking and Monitoring Its Use of Building Studies

To optimize the management of its real property portfolio, PBS should track and monitor its building studies. However, PBS is not doing this effectively.

At a minimum, PBS should preserve building studies in accordance with GSA and PBS policies. GSA Order CIO 1820.2A, dated June 20, 2024, requires PBS to comply with the Federal Records Act of 1950, provides direction for implementing recordkeeping requirements, and assigns recordkeeping responsibilities.⁶ This GSA order requires recordkeepers for: (1) all GSA projects and (2) building and real estate management. The recordkeeper is responsible for maintaining and tracking all records and ensuring proper storage, destruction, and transfer. In addition, GSA's *Recordkeeping for PBS Facilities Management*, dated May 15, 2020, specifically recommends and provides examples for proper naming conventions for building studies and establishes records-retention schedules.

However, PBS is not following these policies. At the beginning of our audit, we requested a list of GSA-owned building studies obligated using BA 61 funds during our 5-year audit period. PBS management could not produce a reliable list because it does not preserve building studies in accordance with its policies. Therefore, PBS cannot effectively track and monitor its building studies and how they are used.

Of the two PBS business lines that primarily request building studies, only Portfolio Management provided us with guidance for how it tracks the studies. The Portfolio Management Repair and Alterations Program specialist told us that Portfolio Management began tracking building studies in 2021 and implemented policy, *Capital Projects Study Program Guidance* (Study Guidance), in 2022 to begin tracking requests, approvals, and costs for the portfolio's building studies. The Study Guidance includes a funding request review and approval process for the various studies Portfolio Management uses. The Study Guidance further instructs PBS's regional offices to upload completed building studies into PBS's Building Assessment Tool (BAT) system.

In contrast, Facilities Management could not provide us with guidance for how it uses building studies or its requirements for tracking and monitoring the studies. The Risk Management Division director told us that Facilities Management does not track and monitor studies it commissions because there is "no business need to do so."

⁶ This order superseded GSA Order CIO 1820.2, *GSA Records Management Program* (March 7, 2014).

PBS Does Not Have Complete, Accurate, and Reliable Data on Its Building Studies

To make informed decisions about its real property portfolio, PBS must have complete, accurate, and reliable data on both its building studies and the actions taken in response to those studies. However, we found that PBS does not have complete, accurate, and reliable data on its building studies and any subsequent actions.

For example, Facilities Management provided data on its building studies that it obtained from GSA's Office of the Chief Financial Officer. However, this data was not accurate because Facilities Management staff told us it included transactions that were not commissioned building studies, such as surveys, fire extinguisher and eye wash inspections, and purchases of supplies and materials. Because we were unable to separate building studies from the other transactions on our own, we concluded that the data was not sufficiently accurate and reliable for use in meaningful analysis and did not assess it further.

Portfolio Management's building study data was also problematic because it did not have a consistent and reliable data source for the studies performed. As a result, Portfolio Management could not produce a reliable listing of building studies in response to our audit request. Instead, Portfolio Management assembled a building study list using: (1) a tracking spreadsheet that GSA's Office of the Chief Financial Officer periodically produces for Portfolio Management and (2) data calls to PBS's regional offices. This building study list included more than 1,200 study requests for GSA-controlled buildings across 12 GSA regions. We could not verify the reliability of the list due to the data deficiencies described below.

- **Lack of Standard Naming Conventions** – Portfolio Management does not use standard naming conventions for its building studies. Specifically, the study report file names in the BAT system are not listed as field names in the building study list. Even after we further examined each document in the BAT system, we could not match all of the documents in the BAT system to entries in the building study list.
- **Potentially Duplicative Data** – The building study list contained many line items that appeared to be for the same or similar studies. For example, there were four entries for a pipe study performed at the Edith Green-Wendell Wyatt Federal Building in Portland, Oregon, with similar study names. However, it appeared that the studies were performed in different fiscal years, each with different costs. When we asked a PBS program specialist about the potentially duplicate line items, he could not confirm if the transactions were duplicate line items or were multiple studies for the same or similar subject matter.
- **Incomplete Data** – We found two deficiencies that were caused by incomplete building study data:
 - Many building study reports in the BAT system were completed during our audit period but not included in the building study list. For example, we found four

study reports in the BAT system for the National Capital Region that were not included on the building study list. We noted similar issues with most of the GSA regions we sampled. When we asked a PBS program specialist about the study reports, he could not explain why they were missing from the building study list.

- Portfolio Management did not record the actions taken, if any, in response to building study recommendations. The Portfolio Management Repair and Alterations Program specialist told us that they did not have enough staff to monitor and record if, or how, they were using the completed study reports.

Notwithstanding the data deficiencies described above, we selected a sample of 158 building studies for 48 buildings across five GSA regions from the building study list to determine if they were uploaded into the BAT system. As shown in *Figure 1* below, PBS only uploaded 31 (20 percent) of the 158 building studies in our sample into the BAT system.

Figure 1. Number of Sampled Building Studies Uploaded into the BAT System⁷

GSA Region	Region Name	Number of Sampled Studies from Portfolio Management’s Building Study List	Number of Sampled Studies in the BAT System
2	Northeast and Caribbean Region	32	6
6	Heartland Region	44	5
9	Pacific Rim Region	34	5
10	Northwest and Arctic Region	20	8
11	National Capital Region	28	7
Total		158	31

A PBS program specialist acknowledged that employees were not complying with the Study Guidance requirement to upload completed building studies into the BAT system. The PBS program specialist added that the studies were not uploaded due to reduced staffing levels. He also stated that PBS is in the process of building better controls and processes to collect the building studies, with the goal of uploading them into the BAT system. However, the PBS program specialist stated that PBS is undergoing a reorganization, and all programs, policies, and controls will be re-evaluated based on the new staffing levels and resources in place after the reorganization.

In sum, PBS is not effectively tracking and monitoring its use of building studies. Without complete, accurate, and reliable data on the studies performed, or on the actions taken because of these studies, PBS is limited in effectively managing its real estate portfolio.

⁷ See **Appendix B** for a complete list of the sampled studies by building.

Conclusion

PBS is not effectively managing its building studies. We found that PBS is neither comprehensively tracking nor monitoring its building studies. We also found that PBS does not have complete, accurate, and reliable data on the studies performed, or on the actions taken as a result of the studies. Because of these deficiencies, we were unable to determine if building studies result in effective building management at the best value for taxpayers or if the studies were conducted in accordance with applicable laws and regulations.

PBS is currently undergoing a major reorganization, under which it will move to a centralized management structure with fewer personnel. Under this new structure, PBS will need complete, accurate, and reliable information about all aspects of its operations, including its building studies, to effectively and efficiently allocate resources to manage its nationwide portfolio of buildings.

Accordingly, PBS should develop and implement a method to track and monitor building studies, ensuring that they are easily retrievable. PBS should also develop and implement policies and procedures to ensure: (1) building study data quality, (2) PBS is being a good steward of taxpayer dollars as it relates to building studies, and (3) the studies are preserved in accordance with laws and policy.

Recommendations

We recommend that the PBS Commissioner:

1. Develop and implement a method to track and monitor building studies and ensure that PBS can retrieve all studies efficiently.
2. Develop and implement policies and procedures to ensure that:
 - a. PBS building study data is complete, accurate, and reliable;
 - b. PBS is not wasting tax dollars on unnecessary or duplicative building studies; and
 - c. Building studies are preserved in accordance with the Federal Records Act of 1950 and GSA records-retention policies.

GSA Comments

The PBS Acting Commissioner stated that GSA agrees with the report recommendations. His written comments are included in their entirety in **Appendix C**.

Appendix A – Objectives, Scope, and Methodology

Objectives

We performed this audit to assess PBS’s use of building studies for GSA-owned federal buildings. This audit was included in the GSA Office of Inspector General’s *Fiscal Year 2024 Audit Plan*. Our objectives were to determine if PBS building studies: (1) result in effective federal building management at the best value for taxpayers and (2) are conducted in accordance with applicable laws and regulations.

Scope and Methodology

We evaluated how PBS managed the use of building studies for GSA-owned federal buildings during our 5-year audit period ended September 30, 2024.

To accomplish our objectives, we:

- Reviewed public laws and regulations related to building studies and records retention;
- Reviewed PBS’s policies, processes, and procedures related to building studies;
- Reviewed guidance and interagency memorandums to establish the audit criteria;
- Reviewed a prior GSA Office of Inspector General audit report to identify significant issues that may affect the current audit;
- Evaluated building studies data provided by PBS and GSA’s Office of the Chief Financial Officer to identify building studies performed during our audit period;
- Obtained and reviewed building study reports related to our judgmental sample of building studies to determine if they were uploaded into the BAT system; and
- Held discussions with PBS officials to understand the process for requesting, approving, tracking, and monitoring the use of building studies.

Data Reliability

We assessed the reliability of PBS-provided building study data by tracing the data to source documents and applying logical tests, such as assessments for duplicates and data validity.

We requested the following information for all studies PBS commissioned for GSA-owned buildings and obligated using BA 61 funding during our 5-year audit period ended September 30, 2024:

- Regional office requesting the study;
- Building number associated with each study;
- Year the study was conducted;
- Study name;

- Study reason;
- Name of the contractor that performed the study; and
- Study cost.

PBS officials told us that PBS does not have a central repository that includes the requested level of detail. Therefore, Portfolio Management and Facilities Management enlisted the help of GSA's Office of the Chief Financial Officer to respond to our request. Portfolio Management provided us with a listing of more than 1,200 approved study requests with obligations totaling more than \$133 million for the studies it commissioned. However, as stated in the *Results* section, Portfolio Management does not have a consistent and reliable data source for the studies performed and could not produce a reliable listing of building studies in response to our audit request.

Facilities Management provided us with a preliminary listing of its building studies. However, we could not analyze the listing because it contained many data quality problems. The list included transactions that were not commissioned building studies, such as surveys, fire extinguisher and eye wash inspections, and supply and material purchases. In addition, because of the lack of naming conventions, we were unable to differentiate the building studies from other transactions. In discussions with GSA's Office of the Chief Financial Officer, a supervisory budget analyst stated that he would need much more time to extract the information at the level of detail necessary for this audit. Therefore, in the interest of time, we excluded the Facilities Management building study data from our limited analysis.

Based on this, we determined that the data was not sufficiently reliable for the purposes of this audit. However, we conducted a limited analysis of the Portfolio Management study data that identified deficiencies in the data to support our finding.

Sampling

We selected a judgmental sample of 50 buildings from a list of building studies performed at more than 1,200 GSA-controlled buildings during our 5-year audit period. We selected our sample based upon the cost of building studies per building during our audit period.⁸ We chose the 10 buildings with the highest study costs for five different PBS regions.

The 50 buildings in our sample had 161 building studies performed during the audit period. After an initial examination of our sample, we excluded buildings that were not owned by GSA. This resulted in a sample of 158 building studies across 48 GSA-owned buildings. While this nonstatistical sample design does not allow for projection of the results to the population, it allowed us to address our audit objectives.

⁸ The sample was based on building study costs per building after excluding: (1) building studies not tied to a specific building number in PBS's data and (2) the same studies conducted on multiple buildings.

Internal Controls

We assessed internal controls significant within the context of our audit objectives against GAO-14-704G, *Standards for Internal Control in the Federal Government*. The methodology above describes the scope of our assessment, and the report finding includes any internal control deficiencies we identified. Our assessment is not intended to provide assurance on GSA's internal control structure as a whole. GSA management is responsible for establishing and maintaining internal controls.

Compliance Statement

We conducted the audit between March through October 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

Appendix B – Sampled Studies by Building

This table lists the sampled building studies by GSA-owned building.

GSA Region	Location Number	Building Name	City, State	Number of Sampled Studies from Portfolio Management Building Study List	Number of Sampled Studies in the BAT System	Study Cost (\$) ⁹
2	NY0128	Federal Building	New York, NY	4	0	913,380
2	NY0130	Thurgood Marshall U.S. Courthouse	New York, NY	5	1	655,438
2	NY0131	Alexander Hamilton U.S. Custom House	New York, NY	4	1	631,418
2	NY0282	Jacob Javits Federal Building and James Watson Court of International Trade	New York, NY	3	0	1,042,223
2	NY0300	Leo W. O'Brien Federal Building	Albany, NY	2	0	926,144
2	NY0351	Daniel Patrick Moynihan U.S. Courthouse	New York, NY	2	0	654,776
2	NY0355	Alfonse M. D'Amato U.S. Courthouse	Central Islip, NY	3	0	1,348,906
2	NY0369	Ronald H. Brown U.S. Mission to the U.N.	New York, NY	2	1	1,198,404
2	PR0017	Frederico Degetau Federal Building and Clemente Ruiz-Nazario U.S. Courthouse	Hato Rey, PR	6	3	1,970,236
2	PR0521	U.S. GSA Federal Center	Guaynabo, PR	1	0	500,000
6	IA0027	U.S. Courthouse	Davenport, IA	2	0	240,522
6	IA0087	Federal Building and U.S. Courthouse	Sioux City, IA	2	0	254,650
6	KS0094	Robert J. Dole Federal Building and Courthouse	Kansas City, KS	4	1	305,254
6	MO0050	Charles Evans Whittaker U.S. Courthouse	Kansas City, MO	4	1	635,125
6	MO0095	Thomas F. Eagleton U.S. Courthouse	St Louis, MO	11	3	1,590,161
6	MO0106	Robert A. Young Federal Building	St Louis, MO	4	0	546,720
6	MO0127	Richard Bolling Federal Building	Kansas City, MO	5	0	528,989
6	NE0036	Roman L. Hruska U.S. Courthouse	Omaha, NE	3	0	212,143
6	NE0051	Edward Zorinsky Federal Building	Omaha, NE	5	0	586,537
6	NE0531	Robert Denney Federal Building and U.S. Courthouse	Lincoln, NE	4	0	449,164
9	AZ0058	Federal Building	Tucson, AZ	1	0	257,350
9	AZ0303	Sandra Day O'Connor U.S. Courthouse	Phoenix, AZ	6	2	1,677,548
9	CA0041	U.S. Courthouse	Los Angeles, CA	4	0	862,777
9	CA0096	James R. Browning U.S. Court of Appeals Building	San Francisco, CA	4	0	773,530
9	CA0154	Phillip Burton Federal Building and U.S. Courthouse	Los Angeles, CA	4	1	1,641,195
9	CA0167	Edward J. Schwartz Federal Building and U.S. Courthouse	San Diego, CA	3	2	628,608
9	CA0200	Federal Building	Santa Ana, CA	1	0	292,568

⁹ Dollar amounts in this column are rounded.

GSA Region	Location Number	Building Name	City, State	Number of Sampled Studies from Portfolio Management Building Study List	Number of Sampled Studies in the BAT System	Study Cost (\$) ¹⁰
9	CA0281	Ronald V. Dellums Federal Building and U.S. Courthouse	Oakland, CA	7	0	822,272
9	CA0306	Robert T. Matsui U.S. Courthouse	Sacramento, CA	1	0	473,870
9	CA0323	Los Angeles Federal Courthouse	Los Angeles, CA	3	0	379,152
10	AK0013	Hurff Ackerman Saunders Federal Building and Robert Boochever U.S. Courthouse	Juneau, AK	2	0	956,254
10	AK0029	Fairbanks Federal Building	Fairbanks, AK	1	0	732,253
10	AK0031	Federal Building and James M. Fitzgerald U.S. Courthouse	Anchorage, AK	1	0	581,412
10	ID0025	James A. McClure Federal Building and U.S. Courthouse	Boise, ID	3	1	1,175,412
10	OR0043	Edith Green-Wendell Wyatt Federal Building	Portland, OR	5	3	987,358
10	WA0101	Henry M. Jackson Federal Building	Seattle, WA	4	2	478,761
10	WA0132	Peach Arch Land Port of Entry	Blaine, WA	1	0	558,891
10	WA0551	Ferry Land Port of Entry Station Building	Curlew, WA	2	1	356,716
10	WA0953	Federal Center South	Seattle, WA	1	1	348,476
11	DC0001	Central Heating Plant	Washington, DC	7	3	2,973,544
11	DC0031	GSA-NCR/Regional Office Building	Washington, DC	2	0	869,063
11	DC0034	Wilbur J. Cohen Federal Building	Washington, DC	1	0	1,344,113
11	DC0046	Harry S. Truman Federal Building	Washington, DC	4	2	1,538,220
11	DC0092	Robert C. Weaver Federal Building	Washington, DC	5	0	1,385,866
11	DC0115	Hubert H. Humphrey Federal Building	Washington, DC	2	1	1,138,571
11	DC0459	Ronald Reagan Federal Building and International Trade Center	Washington, DC	4	0	791,390
11	MD0010	Suitland Federal Complex	Suitland, MD	2	0	622,925
11	MD1822	4600 Silver Hill – South	Suitland, MD	1	1	558,225
Total				158	31	\$40,396,510

¹⁰ Dollar amounts in this column are rounded.

Appendix C – GSA Comments

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**U.S. General Services
Administration**

February 11, 2026

MEMORANDUM FOR MICHELLE L. WESTRUP
REGIONAL INSPECTOR GENERAL
HEARTLAND REGION
OFFICE OF AUDITS
OFFICE OF INSPECTOR GENERAL (JA-6)

FROM: ANDREW HELLER *Andrew Heller*
ACTING COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

SUBJECT: Response to the Office of Inspector General (OIG) Draft
Report *PBS Is Not Effectively Tracking and Monitoring
Building Studies* (Report No.: A240084)

The U.S. General Services Administration (GSA) Public Buildings Service appreciates the opportunity to review and comment on the GSA Office of Inspector General's (OIG) report titled *PBS Is Not Effectively Tracking and Monitoring Building Studies* (A240084).

The OIG made the following recommendations to GSA:

- 1) Develop and implement a method to track and monitor building studies and ensure that PBS can retrieve all studies efficiently.
- 2) Develop and implement policies and procedures to ensure that:
 - a) PBS building study data is complete, accurate and reliable;
 - b) PBS is not wasting tax dollars on unnecessary or duplicative building studies; and
 - c) Building studies are preserved in accordance with the Federal Records Act of 1950 and GSA records retention policies.

GSA agrees with the recommendations and is developing a plan to address them.

Please contact Michael Doede, Senior Real Property Asset Management Specialist, PBS Office of Portfolio Management, at michael.doede@gsa.gov, with any questions regarding this response.

U.S. General Services Administration
1800 F St. NW
Washington, DC 20405
www.gsa.gov

Appendix D – Report Distribution

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**Office of Inspector General
U.S. General Services Administration**

1800 F Street, NW

Washington, DC 20405

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